

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

JOHN HANCOCK LIFE INSURANCE )	
COMPANY, JOHN HANCOCK )	
VARIABLE LIFE INSURANCE )	
COMPANY, and MANULIFE )	
INSURANCE COMPANY (f/k/a )	Civil Action No. 05-11150-DPW
INVESTORS PARTNER LIFE )	
INSURANCE COMPANY), )	
	)
	)
<i>Plaintiffs,</i> )	
	)
v. )	
	)
ABBOTT LABORATORIES, )	
	)
<i>Defendant.</i> )	

**ABBOTT LABORATORIES' MOTION  
FOR I.MPOUNDMENT OF CONFIDENTIAL INFORMATION**

Pursuant to Local Rule 7.2, Defendant Abbott Laboratories (“Abbott”) respectfully moves for leave to file under seal its Errata Regarding the Declaration of Eric J. Lorenzini in Support of Abbott’s Motion to Strike the Prayer for Rescission in Hancock’s First Amended Complaint (“Errata”) on the grounds that the Errata includes an exhibit containing competitively sensitive information. Concurrently with this motion, Abbott is filing a public version of the Errata in which only the competitively sensitive exhibit is redacted.

The grounds for this motion are that Exhibit 1 to the Errata contains competitively sensitive information regarding Abbott’s development of various drug compounds and has been designated “Confidential” by Hancock pursuant to the Protective Order. *See* Errata, Ex. 1. Disclosure of the information contained in this exhibit could cause competitive harm to Abbott by providing competitors with proprietary information regarding Abbott’s drug development.

WHEREFORE, Abbott respectfully requests that the Errata be impounded until further Order of the Court. In addition, Abbott respectfully requests that the Court accept the Errata provisionally under Seal pending the Court's ruling on this Motion. Concurrently with this motion, Abbott is filing a public version of the Errata in which only the competitively sensitive Exhibit 1 is redacted.

Dated: March 9, 2007

Respectfully submitted,

ABBOTT LABORATORIES

By: /s/ Michael S. D'Orsi

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**LOCAL RULE 7.1 AND 37.1 CERTIFICATION**

The undersigned hereby certifies that counsel for Abbott Laboratories has conferred with counsel for Plaintiffs in a good faith effort to resolve or narrow the issues in this Motion.

\_\_\_\_\_/s/ Michael S. D'Orsi \_\_\_\_

Date: March 9, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on December 1, 2006.

Date: March 9, 2007

\_\_\_\_\_/s/ Michael S. D'Orsi \_\_\_\_